

EXHIBIT

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Messer, Suzanne

From: Messer, Suzanne
Sent: Tuesday, June 22, 2021 11:33 AM
To: Blake Abbott; Fellows, Jonathan; CULT
Subject: RE: Upcoming Discovery Responses/Deposition in Pace University

Blake,

Thank you for this information. Please keep us apprised as to when you will be in a position to respond to the outstanding written discovery demands and when you will be able to produce your client for her deposition.

We are prepared to proceed with the depositions of the following Pace representatives next week as you have requested:

Tuesday, June 29, 2021 beginning at 2 pm: Vanya Quinones
Wednesday, June 30, 2021 from 9:00 am – 1:00 pm: Paul Dampier
Wednesday, June 30, 2021 from 1:00 pm – 5:00 pm: Angelica Ferreira
Thursday, July 1, 2021 from 9:00 am – 1:00 pm: Rachel Carpenter
Thursday, July 1, 2021 from 1:00 pm – 5:00 pm: Bob Almon

You have also asked for the depositions of Mary Baglivo, Joan Walker and Robina Schepp. These witnesses are not available next week. I will follow up with you shortly with proposed dates to complete these depositions in mid-July.

It is our understanding that you intend to proceed by remote means, and that you will therefore arrange for the stenography services. Please advise of the arrangements.

Suzanne

Suzanne Messer, Esq.
315.218.8628

From: Blake Abbott <blake@akimlawfirm.com>
Sent: Thursday, June 17, 2021 5:38 PM
To: Messer, Suzanne <messers@bsk.com>; Fellows, Jonathan <fellowj@bsk.com>; CULT <cult@akimlawfirm.com>
Subject: Upcoming Discovery Responses/Deposition in Pace University

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Suzanne,

We recently learned that our client was hospitalized with a serious injury. We were able to touch base with her a few weeks ago and have not been able to communicate with her since. We are fearful that she may have been hospitalized once again. Would you be agreeable to an extension for our upcoming discovery response deadline and rescheduling of her deposition?

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Blake G. Abbott, Esq.

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